

**CLASSIFICATION APPEAL DECISION
U.S. OFFICE OF PERSONNEL MANAGEMENT
CHICAGO OVERSIGHT DIVISION**

INCUMBENTS: [the appellants]

JOB NUMBER: 5845A

AGENCY CLASSIFICATION: Medical Equipment Repairer
WG-4805-11

JOB LOCATION: Department of Veterans Affairs
Veterans Health Administration
Engineering Service
Maintainance and Operations Section
Medical Center
[location]

OFFICE OF PERSONNEL MANAGEMENT DECISION: **WG**, series and grade to be determined following agency workload analysis and redescription of job.

OPM DECISION NUMBER: C-4805-11-01

This appellate decision constitutes a certificate that is mandatory and binding on administrative, certifying, payroll, and accounting offices of the Government. It is the final administrative decision on the classification of the job, not subject to further appeal. It is subject to discretionary review only under the conditions and time limits specified in Part 511, Subpart F, of Title 5, U.S. Code of Federal Regulations.

/s/

FREDERICK J. BOLAND
CLASSIFICATION APPEALS OFFICER

August 27, 1996

DATE

Decision Transmitted To:

[CCs]

INFORMATION CONSIDERED

- Appellants' letter of appeal, dated October 2, 1995.
- Agency report on job, dated September 18, 1995.
- Copy of the official description of the appellant's job, number 5845A.
- Copy of desk audit notes and job evaluation statement reflecting agency's application of job classification standard.
- Copy of the official description of the appellant's supervisor's job.
- Copy of the organization chart and statement of functions for the Engineering Service.
- Telephone discussion of job duties with one or more of the appellants on April 9, May 30, and July 17, 1996.
- Sample medical equipment evaluation reports prepared by appellants.

EVALUATION CRITERIA

- OPM Job Grading Standard for Medical Equipment Repairer, WG-4805, dated June 1974.

INTRODUCTION

The appellants contest their agency's pay plan decision which moved them from the General Schedule (GS) to the Federal Wage System (FWS). They are assigned as Medical Equipment Repairers, WG-4805-11, in [VA]. They feel their work should be classified under the General Schedule and assigned to the Engineering, GS-802, series because of, among other things, their ability to fabricate and design electronic equipment, plan and accomplish complex projects, and evaluate the operation and suitability of medical equipment.

JOB INFORMATION

The appellants are part of an eight member staff in [VA]. The section has two WG-10 General Equipment Mechanics, one WG-7 Electrical Equipment Mechanic, and one WG-6 General Equipment Repairer. They report to a WS-9 Maintenance Supervisor.

The appellant's duties, according to the job description, include not only maintenance, troubleshooting, and repair of medical equipment, but also the evaluation, installation, inspection, testing, calibration, modification, and design of medical equipment or components. As envisioned in the job description, this includes modifying machines and devices in accordance with manufacturers' specifications and instructions and [VA] directives and fabricating or designing devices not commercially available.

However, our interviews with the appellants and their supervisor as well as our review of work logs and evaluation reports submitted by the appellants indicate they spend substantial time repairing and

maintaining various types of nonmedical equipment. Work logs indicate, for example, that they check and repair coffee pots, stereo cassette players, Norelco shavers, and Lanier Dictaphones rather than medical equipment. Specific work examples of significant medical equipment analysis and evaluation are notably lacking, as are examples of significant design and modification of medical equipment circuits and components. Because these and other findings detailed below indicate the job description misstates the nature of their regular and recurring work, we request its correction in our transmittal letter to the agency.

ANALYSIS AND FINDINGS

Pay System Determination

A job is exempt from the General Schedule only if (a) its primary duty or responsibility requires trades, crafts, or laboring experience and knowledge, and (b) that requirement is paramount (i.e., embodies the essential, prerequisite knowledge, skills, and abilities needed to perform the primary duty or responsibility for which the job has been established). A position is subject to the General Schedule, however, even if it does require physical work, if its primary duty requires knowledge or experience of an administrative, clerical, scientific, artistic, or technical position not related to trades, crafts, or manual labor work.

Maintenance and repair work is typically regarded as trade or Federal Wage System work and usually performed in or from a shop, while evaluation and design work is typically regarded as technician or General Schedule work and usually performed in a laboratory or under the direction of an individual with professional training in the appropriate field of work. For example, the Medical Equipment, WG-4805, job grading standard states:

Medical Equipment Repairers install, modify, troubleshoot, maintain, test, calibrate, adjust, overhaul, and repair a wide variety of medical, laboratory, and dental equipment (electronic, electrical, and mechanical).

The standard excludes such work, however, when it is performed by technicians incidental to the development and evaluation of medical equipment. Development and evaluation are engineering functions and, therefore, when such work is performed by nonprofessionals, it is often to support a professional engineer who actually directs the work.

Work that involves a mix of trade and technician duties is classified according to its primary duty, which is determined by such things as (a) the nature of work products or services of the organization, (b) working relationships with other jobs in the organization, (c) normal lines of career progression, (d) equitable pay relationships with other jobs in the immediate organization, and (e) management's intent, or purpose, in creating the job.

In examining these determinants, the appellant's primary duty clearly is trade, not technician, related. This is evident in considering each determinant as follows.

Nature of Work Products or Services

Among the claims the appellants make suggesting their work is technical, rather than trade, related are that:

- they work in direct support of the chief engineer,
- they are required to be primary evaluators of medical equipment to ensure that it fits all applications that the doctors and nurses want/need,
- they are required to possess a thorough knowledge of anatomy and physiology, and the principles and techniques of the operation of medical equipment,
- they are Biomedical technicians who comply with Department of Medicine and Surgery MP-3, G-29 series to allow performance checks on medical equipment,
- they work on many issues from the purchase and evaluation of medical equipment in accordance with the Safe Medical Devices Act of 1990 to writing reports on medical recalls, and safety alerts,
- they work with other positions in the organization such as doctors, nurses, architects, engineers, and the Chief of Psychiatry,
- they serve as technical advisors and consultants to supervisors, clinical, and administrative personnel in the evaluation and purchase of new equipment, development and review of technical equipment specifications, site preparation and installation of new equipment, and review of biomedical related project design and construction,
- they inspect tuberculosis isolation rooms for compliance with Centers for Disease Control regulations for negative pressure and air exchange, and
- they sit in on project review teams with architectural and engineering firms.

As indicated in the agency desk audit of the job conducted in 1994 and our telephone interviews with the appellants' in July 1996, the majority of time spent on the job is in preventive maintenance and repair. The record reveals that the appellants repair and maintain electrical equipment of various types, medical and nonmedical. Work logs indicate the appellants check and repair coffee pots, stereo cassette players, Norelco shavers, and Dictaphones, trade work typically performed by Electricians or Electronics Mechanics. Memos and other documents show that they also test, repair, and make limited modifications to hospital beds, wheelchairs, ventilators, oxygen concentrators and regulators, and other types of equipment. Less frequently listed are repairs to radiographic diagnostic and treatment units, cardiac defibrillators, hemodialysis units, ultracentrifuges, spectrophotometers, ultrasonic therapy equipment, electrophoresis apparatus, gas chromatographs, electron microscopes, X-ray units, electrocardiograph machines, cardiac monitors, electrosurgical units, electroencephalographs, radiography high speed film processors, and other such medical equipment whose servicing may sometimes be handled under contract. Checking and calibrating such equipment are more frequently listed.

Regular and significant technical evaluations, development of specialized circuits or components, and complex modifications to standard medical equipment are notably absent from the logs, work samples, and other information provided by the appellants to support their assertions that they conduct technical studies, alter designs, and modify medical equipment as highly experienced Engineering Technicians would. The examples of evaluative work they provide, such as the checklist style quality assurance forms, sketchy equipment failure forms, and brief memos transmitting or recapping safety alerts from manufacturers, denote assignments demanding lesser analysis and knowledge than the repair work for which they have already been credited. In short, virtually none of the specific work examples provided illustrate significant use of specialized, complicated techniques such as technicians would employ in assessing unusual equipment applications or devices and in analyzing considerable and conflicting technical data.

Contrary to their assertions, they do not work under an engineer or anyone else with professional biomedical engineering credentials. They receive performance appraisals from a trades supervisor, a WS-9 who heads their section. Were they under the direction of a Biomedical Engineer, they undoubtedly would have some of the opportunities to perform significant technician work such as listed in their job description. Although they may have the training, experience, and skill to do such work, their organization, work environment, and regular assignments demand trade skill instead.

Similarly, their work with other trade staff in checking air exchange and pressure in isolation rooms is common to the heating, air conditioning, ventilation, and cooling trade and typically performed by Air Conditioning Mechanics rather than Engineering Technicians.

We find this aspect of the appellants' work trade related.

Relationship to Other Jobs, Career Progression, and Pay Equity

In support of their appeal, the appellants indicate that:

- they have just completed a move to a patient care building, which puts their section in close access to the medical team,
- they deal effectively with a wide variety of people at all levels at the Center, including doctors, nurses, the Chief of Engineering, outside vendors, and contractors.

As noted previously, other jobs in their section are trade jobs. There are no related technician jobs to progress to and no professional biomedical engineering positions to support. The work is preponderantly maintenance and repair, as is the case with many others in the Engineering Service, and the WG pay scale is consistent with other job classifications in their immediate organization.

We find these aspects of the appellants' work all trade related.

Management's Intent

The appellants note that they were required to take the international certification exam for Biomedical Technicians, which was paid for by the Medical Center, and that they are required to have knowledge of regulations, e.g., National Fire Protection Association 99, Joint Commission on Accreditation of

Health Care Organizations, Centers for Disease Control, etc. They feel the exam requirement proves management's intent for the job to function in a technician capacity. Such training may improve their performance on tasks where their trade duties overlap technician work and on the occasional pure technician assignment. However, their regular and recurring assignments determine the job's classification and such training is compatible with trade work. We find this aspect of the appellants' work trade related.

DECISION

The job is properly exempt from the General Schedule and placed under the Federal Wage System as a **WG** job. Because the job description misstates the nature of assignments, it is unsuitable for further classification of the job. Similarly, the work logs provided suggest that even though Medical Equipment Repair work exists, it may be insufficient to support all three appellants. Consequently, the series and grade should be set by the agency following a workload analysis and redescription of the job in proper format and consistent with this decision's findings.